

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

EDUARDO GARZA MORA,

Plaintiff,

v.

THE GILLETTE COMPANY,

Defendant.

Civil Action No.: 05-11651RCL

**JOINT MOTION TO EXTEND THE  
DISCOVERY DEADLINE SET FORTH IN THE SCHEDULING ORDER**

Plaintiff Eduardo Garza Mora and Defendant The Gillette Company, collectively, the "Parties", jointly move that the deadline for the completion of fact depositions and discovery, currently set for June 30, 2006, in the above-captioned matter be extended through and including July 31, 2006, solely for the purposes of conducting the depositions of Claudio Ruben and Kalpana Shanmugham and completing the deposition of Plaintiff.

In support of this motion, the Parties state that, due to a number of scheduling conflicts, the Parties require additional time to conduct and complete these depositions.

WHEREFORE, the Parties hereby move that the deadline for the completion of fact discovery set forth in the Court's Electronic Scheduling Order, dated February 27, 2006 be extended as described above.

EDUARDO GARZA MORA

By his attorney,

*Neil Osborne (cap for)*  
Neil Osborne (BBO# 567674) *N Osborne*  
41 West Street, 7<sup>th</sup> Floor *Mass*  
Boston, MA 02111-1216  
(617) 482-1160

Dated: June 23, 2006

THE GILLETTE COMPANY

By its attorneys,

*/s/ Christine A. Phipps*  
Anthony D. Rizzotti (BBO# 561967)  
Christine A. Phipps (BBO# 658942)  
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One International Place  
Boston, MA 02110-2624  
(617) 951-7000

Dated: June 23, 2006

Certificate of Service

I hereby certify that on June 23, 2006, a true and correct copy of the foregoing document was served upon the attorney of record for Plaintiff, Neil Osborne, Esq., 41 West Street, 7th Floor, Boston, MA 02110, by certified mail.

/s/ Christine A. Phipps  
Christine A. Phipps